

NOV 21 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

ABELLANOSA, JOANNA, et.
al.,

Plaintiffs,

v.

**L&T INTERNATIONAL
CORPORATION.**

Defendant.

Civil Action No. 05-0010

**PLAINTIFFS' CASE
MANAGEMENT CONFERENCE
STATEMENT PURSUANT TO
LR 16.2CJ.e.2**

Date: November 25, 2005

Time: 9:30 a.m.

Judge: Hon. Alex R. Munson

Plaintiffs, through counsel, hereby request leave of Court to submit their Case Management Conference Statement as required by Local Rule 16.2CJ.e.2 out of time, as follows:

A. **Service of process on parties not yet served.** Defendant L&T International Corporation has been served. There are no named parties not yet served.

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1 B. **Jurisdiction and Venue.** The Court has jurisdiction over this case
2 and this matter has been properly brought before it.

3 C. **Track Assignment.** Plaintiffs agree with the recommendation of
4 the Court that this case be assigned to the Standard Track as defined by Local
5 Rule 16.2CJ.c.

6 D. **Anticipated motions.** Plaintiffs anticipate filing motions for
7 summary judgment/partial summary judgment.

8 E. **Anticipated discovery or remaining discovery, including**
9 **limitation on discovery.** Because of the large number of Plaintiffs not fluent in
10 English and varying factual circumstances among certain workers, Plaintiff would
11 request an appropriate expansion of the limitation on the number of
12 interrogatories/admissions, if any. Otherwise, Plaintiffs agree that the limitations
13 under Local Rule 16.2CJ.c.1(b) for cases assigned to the standard track, should be
14 applicable.
15

16 F. **Appropriateness of special procedures such as consolidation of**
17 **actions for discovery or pretrial, reference to a master or to arbitration or to**
18 **the Judicial Panel or Multidistrict Litigation, or application of the Manual**
19 **for Complex Litigation.** Plaintiffs do not find the need for use of any special
20 procedures at this time.
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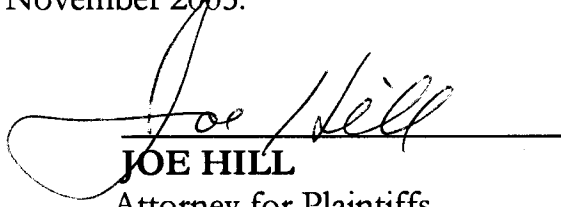
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1 **G. Modifications of the standard pretrial procedures specified by**
2 **this Plan on account of the relative simplicity or complexity of the action or**
3 **proceeding.** Plaintiffs do not see any need to modify the standard pretrial
4 procedures specified by this Plan, except as necessary to accommodate translation
5 (translators) for Plaintiffs.

6 **H. Settlement prospects.** No settlement discussions have been
7 undertaken. Plaintiffs are amenable to discussing possible settlement.
8

9 **I. Any other matter which may be conducive to the just, efficient,**
10 **and economical determination of the proceeding, including the definition**
11 **or limitation of issues.** At this time, Plaintiffs have identified no such matters.

12 **DATED** this 21st day of November 2005.

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15 **JOE HILL**
Attorney for Plaintiffs

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